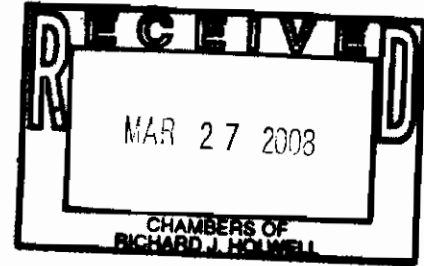




The Ottinger Firm, PC

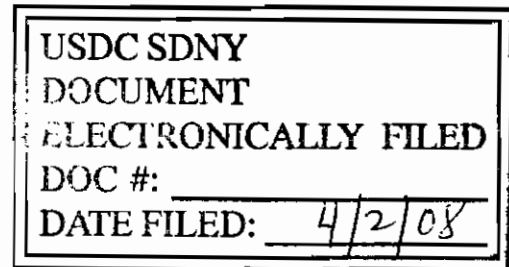
March 27, 2008



BY FACSIMILE

Hon. Richard J. Holwell
United States District Judge
Daniel Patrick Moynihan
United States District Court House

Re: Re: Ahlgrim, et al v. Flinchum, et al
07 Civ. 04002 (RJH)



Dear Judge Holwell:

This firm represents the plaintiff's in this action. I write to request an extension of the discovery deadlines and an adjournment of the pretrial conference. This is the first request for an extension of time.

The discovery deadlines and pretrial conference dates are set forth in the attached Order dated October 5, 2007. Defendants have consented to a thirty day extension of these dates. Plaintiff, however, respectfully requests that the dates be extended by sixty days because neither party has been deposed yet and follow up discovery may be necessary. Since the federal rules allow thirty days to respond to any follow up document demands, it will be impossible to conduct follow up discovery if the dates are only extended by thirty days.

I respectfully request that the dates be extended as follows: (1) fact discovery in this action and the parallel state proceeding shall be completed by May 29, 2008, and (2) a pretrial conference shall be held on June , 2008. The current Order contemplates deadlines for expert discovery, but at this point neither party has proposed the use of experts. If expert discovery is necessary, I respectfully request that the issue be deferred until the pretrial conference.

Application Granted
Respectfully submitted,
Conference to be held on 6/13/08 at 10:00 am.

Robert W. Ottinger

SO ORDERED

Cc: Chris Brennan (by facsimile)

[Signature]
USDC
3/28/08

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To: Hon. Richard J. Holwell Fax: 212 805-7948

From: Robert Ottinger Date: 3-27-08

Re: AM/glin v. Fletcher Pages: 2 including cover

cc: Chris Brenna 212 319-7605

Comments: Please see attached.